

From: [Detterman, Karel, Env. Health](#)
To: ["Karen Burlingame"](#)
Cc: [Messerotes, Gary](#); ["Hardin, Jack"](#); [Roe, Dilan, Env. Health](#)
Subject: FW: RE: Fuel Leak Case RO474 Merritt Tire Sale, Geotracker Global ID T0600101801, Goodyear DEX #9578, 3430 Castro Valley Boulevard, Castro Valley, California
Date: Tuesday, November 25, 2014 3:18:52 PM
Attachments: [Attachment_1_and_ftpUploadInstructions_2014-05-15.pdf](#)

Hello Karen, Gary, and Jack:

Thank you for participating in a conference call with Alameda County Environmental Health (ACEH) on Friday, November 21, 2014. The purpose of the call was to discuss the report entitled *ACEH Comments and a Tabular Site Conceptual Model and Data Gap Summary and Proposed Investigation (SCM)*, dated July 16, 2014, and submitted on Goodyear's behalf by Stantec Consulting Services, Inc. (Stantec). The SCM also included the May 21, 2014 results of groundwater sampling of MW-4 and MW-5. Thank you for submitting the SCM and analytical results.

ACEH has evaluated the data and recommendations presented in the SCM in conjunction with the case files, and the State Water Resources Control Board's (SWRCBs) Low Threat Underground Storage Tank Case Closure Policy (LTCP) adopted in 2012. As a result of discussions during the conference call, it was apparent to ACEH that sufficient site data is available to eliminate the data gaps identified in the SCM. However, other data gaps, discussed below, were identified. Based on ACEH staff review, we have determined that the site fails to meet the LTCP Media-Specific Criteria for Groundwater and the Media-Specific Criteria for Vapor Intrusion to Indoor Air. Therefore, ACEH requests that you address the Technical Comments provided below in an updated Site Conceptual Model accompanied by a Request for Closure by the date provided below.

Technical Comments:

- 1. LTCP Media Specific Criteria for Groundwater** – To satisfy the media-specific criteria for groundwater, the contaminant plume that exceeds water quality objectives must be stable or decreasing in areal extent, and meet all of the additional characteristics of one of the five classes of sites listed in the policy.

Our review of the case files indicates that insufficient data and analysis has been presented to support the requisite characteristics of the plume length. According to the LTCP, a plume is considered stable or decreasing if a contaminant mass has expanded to its maximum extent. As discussed during the conference call, please revise the SCM to include the following lines of evidence:

a. Distal end of plume:

Please perform a Preferential Pathway and Sensitive Receptor Study to determine if sensitive receptors are present in the downgradient vicinity of the site. The Rose diagram provided in the SCM indicates that the prevalent groundwater flow direction is to the south. ACEH requests review of both Alameda County Public Works Agency (ACPWA) and Department of Water Resources (DWR) well data sources for a complete inventory of vicinity water supply wells. ACEH requests the identification and location on a site vicinity figure all active, inactive, standby, decommissioned (sealed with concrete), unrecorded, and abandoned (improperly decommissioned or lost) wells including irrigation, water supply, industrial, livestock, dewatering, and cathodic protection wells within a ¼-mile radius of the subject site. Additionally, please identify on the same figure beneficial resources and other sensitive receptors including, but not limited to, groundwater classification, wetlands, surface water bodies, natural resources, schools, hospitals, day care centers, elder care facilities, etc. Please plot the numbered well locations on an aerial photography-based figure and provide a table with the same numbered well locations similar to the examples provided in ACEH's 11/21/2014 e-mail attachments.

By referencing Table 1: *Plume Characteristics*, in the LTCP's *Technical Justification for Groundwater Media-Specific Criteria*, please plot on a separate figure the average, 90th percentile, and maximum plume lengths for benzene, MTBE, and TPHg using MW-3 as the source. Additionally, please reference and provide literature-based free-product concentration ranges for oil and grease in groundwater and plot that concentration and estimated plume length on the figure.

b. Proximal end of Plume:

Please utilize the results of the May 2014 sampling of MW-4 and MW-5 to document groundwater quality at the proximal end of the plume. Please note that MW-5 is screened similarly to and is located directly downgradient of former well MW-3 which was located in the source area and frequently was found to contain free-product. Because MW-3 was screened at a similar depth and lithology as MW-5, ACEH recognizes MW-5 as a valid downgradient well for the former source area. The sampling results did not indicate the presence of VOCs and SVOCs above their respective detection limits, or free product.

- 2. LTCP Media Specific Criteria for Vapor Intrusion to Indoor Air** – The LTCP describes conditions, including bioattenuation (unsaturated) zones, which if met will assure that exposure to petroleum vapors in indoor air will not pose unacceptable health risks to human occupants of existing or future site buildings, and adjacent parcels. Appendices 1 through 4 of the LTCP criteria illustrate four potential exposure scenarios and describe characteristics and criteria associated with each scenario.

Please revise the SCM to include the following lines of evidence, as discussed during the conference call, that provide justification as to why the site meets the Media-Specific Criteria for Vapor Intrusion to Indoor Air:

- a. Based on site boring logs, the bioattenuation (unsaturated) zone at the site appears to be approximately 8' thick below ground surface (bgs);
- b. In 2012, a source removal action occurred with the excavation and removal of a volume of soil measuring 60 feet by 15 feet by 8 feet bgs;
- c. The sampling results did not indicate the presence of VOCs and SVOCs above their respective detection limits, or free product.

3. **Table 4-1, SCM Revision Request:** Please revise page 8 of Table 4-1, SCM, regarding the current status of the facility: it is an active commercial tire and auto service center, but it is not an active fueling facility as there are no USTs present at the site.

TECHNICAL REPORT REQUEST

Please upload the technical report to the ACEH ftp site (Attention: Karel Detterman), and to the State Water Resources Control Board's Geotracker website, in accordance with Attachment 1 and the following specified file naming convention and schedule:

- **January 30, 2015** – Request for Closure including the Revised Site Conceptual Model
File to be named: RO479_RFC_SCM_R_yyyy-mm-dd

This report is being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

Online case files are available for review at the following website: <http://www.acgov.org/aceh/index.htm>.

Thank you for your cooperation. Should you have any questions or concerns regarding this correspondence or your case, please send me an e-mail message at karel.detterman@acgov.org or call me at (510) 567-6708.

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org

PDF copies of case files can be downloaded at:

<http://www.acgov.org/aceh/lop/ust.htm>

From: Detterman, Karel, Env. Health
Sent: Friday, November 21, 2014 12:51 PM
To: Messerotes, Gary; 'Hardin, Jack'; 'Karen Burlingame'
Cc: Roe, Dilan, Env. Health
Subject: RE: Fuel Leak Case RO474 Merritt Tire Sale, Geotracker Global ID T0600101801, Goodyear DEX #9578, 3430 Castro Valley Boulevard, Castro Valley, California

Hello Karen, Gary, and Jack:

Attached are examples of ACEH's preferred format for both the well survey based on the data bases from Alameda County Public Works Agency (ACPWA) and California Department of Water Resources (DWR) and a "Plume Length Study" based on the LTCP's *Technical Justification for Groundwater Media-Specific Criteria*. I will send you a second e-mail directive letter as we discussed in today's meeting.

Thank you,

Karel Detterman, PG
Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Bay Parkway
Alameda, CA 94502
Direct: 510.567.6708
Fax: 510.337.9335
Email: karel.detterman@acgov.org